

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
Daryl Frank Swartz	:	
Elaine Renee Swartz	:	Chapter 13
Debtor	:	
	:	Case No. 1:19-bk-01790-HWV
Jack N. Zaharopoulos	:	
Standing Chapter 13 Trustee	:	
Movant	:	
v.	:	
Daryl Frank Swartz	:	
Elaine Renee Swartz	:	
Respondent	:	

DEBTORS RESPONSE TO
TRUSTEE'S OBJECTION TO SEVENTH PLAN

AND NOW, this 22nd day of March, 2023, come the Debtors / Respondents,
Daryl Frank Swartz and Elaine Renee Swartz, by and through her counsel, CGA Law
Firm and Lawrence V. Young, Esquire, responds as follows:

1. Statutory time period for completing a Chapter 13 Plan is five (5) years.
Six (6) additional months would deprive the Debtors/ Respondents of the full five (5)
year period that they would have to liquidate their extremely valuable piece of business
real estate for the purpose of paying all creditors. The failure to pay all creditors out of
the sale of the business real estate might then expose the Debtors'/ Respondents'
residence to execution, thereby causing them to lose their home.

WHEREFORE, it is requested that the Court overrule the Trustee's objection.

Respectfully submitted,
CGA Law Firm

/s/ Lawrence V. Young
Lawrence V. Young, Esquire
Sup. Ct. I.D. No. 21009
Counsel for Debtor-Respondent
135 North George Street
York, PA 17401
(717) 848-4900

CERTIFICATE OF SERVICE

I hereby certify that on March 22, 2023, service upon all interested parties indicated below was made by sending a true and correct copy of the Debtor's Response to Trustee's Objection to Plan, by ECF upon:

Jack N. Zaharopoulos
Chapter 13 Trustee

/s/ Lawrence V. Young
Lawrence V. Young, Esquire